CRYSTAL J. HERRERA, ESQ. 1 Nevada Bar No. 12396 CLARK COUNTY SCHOOL DISTRICT 2 OFFICE OF THE GENERAL COUNSEL 5100 West Sahara Avenue 3 Tel: (702) 799-5373 4 Fax: (702) 799-5505 Las Vegas, Nevada 89146 5 Herrec4@nv.ccsd.net Attorneys for Defendants 6 7 8 9 SHAUN TAYLOR, 10 11 Plaintiff, 12 VS. 13 CLARK COUNTY SCHOOL DISTRICT; 14 KEITH FRANCE, an individual; DOES 1 through X; and ROE CORPORATIONS 1 15 through X, 16 Defendant. 17 18 19 20 21

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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

CASE NO.: 2:19-cv-00999-GMN-GWF

STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO FILE REPLY IN SUPPORT OF MOTION **TO DISMISS** 

[FIRST REQUEST]

Plaintiff Shaun Taylor ("Plaintiff") and Defendants Clark County School District and Keith France (collectively, "Defendants"), by and through their respective attorneys of record, hereby stipulate to briefly extend the time for Defendants to file a Reply, in support of their Motion to Dismiss (ECF No. 13) and in response to Plaintiff's Opposition (ECF No. 18), from the current deadline of November 4, 2019, up to and including November 8, 2019. This is the first request for an extension of time to file such a Reply.

Defendants seek the extension of time to allow additional time to prepare an appropriate response in support of their Motion to Dismiss. Defendants filed a Motion to Dismiss Plaintiff's Complaint on October 8, 2019. ECF No. 13. Plaintiff opposed the Motion on October 28, 2019.

1	ECF No. 18. Defendants' Reply in response to Plaintiff's Opposition is currently due on November	
2	4, 2019. Because this is Plaintiff's second lawsuit against Defendants and the former was partly	
3	adjudicated in Defendants' favor (Case No.: 2:18-cv-01264-KJD-VCF), counsel requires additional	
4	time to address res judicata issues. Additionally, in light of defense counsel's other deadlines and	
5	prior commitments, the parties agree to a brief four (4) day extension through November 8, 2019,	
6	for Defendants to file a Reply. The extension will have no significant or prejudicial impact on the	
7	proceedings.	
8	This request is made in good faith and not for the purpose of delay.	
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10	Dated: November 1, 2019	Dated: November 1, 2019
11	LIZADA LAW FIRM, LTD.	CLARK COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL
12	Dry /a/ Angela Linada	Dry /a/Countal I Hamona
13	By: <u>/s/ Angela Lizada</u> Angela J. Lizada, Esq. (#11637)	By: /s/ Crystal J. Herrera Crystal J. Herrera (#12396)
14	Lizada Law Firm, Ltd. 501 S. 7th Street	5100 West Sahara Avenue Las Vegas, Nevada 89146
15	Las Vegas, NV 89101 Attorney for Plaintiff	Attorney for Defendant
16	Anomey for 1 tuning	
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18	<u>ORDER</u>	
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20	IT IS SO ORDERED.	
21	DATED this 13 day of November, 2019.	
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24		Gloria M. Navarro, District Judge United States District Court
25		Salton Salto Dibilot Court
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